

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DISTRICT

GOVERNMENT OF GUAM  
RETIREMENT FUND, *et al.*,

Plaintiff,

vs.

INVACARE CORPORATION, *et al.*,

Defendants.

Case No. 1:13CV1165

JUDGE CHRISTOPHER A. BOYKO

**LEAD PLAINTIFF'S NOTICE OF MOTION TO COMPEL  
INITIAL DISCLOSURES AND DISCOVERY FROM DEFENDANTS**

PLEASE TAKE NOTICE that the Lead Plaintiff the Government of Guam Retirement Fund (“Guam” or “Lead Plaintiff”) respectfully moves this Court for entry of an Order pursuant to Rules 26(a) and 37(a) of the Federal Rules of Civil Procedure compelling Defendants: (1) to make initial disclosures within five days; (2) respond to Lead Plaintiff’s written discovery served on October 14, 2014 on or before November 13, 2014; (3) and for such further relief as the Court may deem just and proper.

This Motion is based upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of David R. Kaplan filed herewith, the pleadings and other such filings herein, and such other written or oral argument as may be permitted by the Court.

Dated: October 31, 2014

Respectfully submitted,

/s/ Benjamin Galdston  
BENJAMIN GALDSTON

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